

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
) Criminal No. 05-30035-MAP
)
)
 v.)
)
)
 2) ELIZABETH CORTES,)
 Defendant.)

GOVERNMENT'S THIRD MOTION FOR ENTRY
OF AN ORDER OF EXCLUDABLE DELAY

Now comes the United States, by its undersigned attorneys,
and hereby moves that the Court enter an Order of Excludable
Delay from December 21, 2005, through October 2, 2006, pursuant
to 18 U.S.C. §§ 3161(h)(3)(A) and (h)(8)(A). The government
relies on the following in support thereof.

During the October 17, 2005 Status Conference the defendant
requested time within which to review discovery including CD's
and DVD's of the charged drug transactions. The Court continued
the case until November 29, 2005, for a Pretrial Conference.
During the November 29, 2006, Pretrial Conference the defendant
requested more time to access and review the DVD's. Further, the
defendant requested more time for reasons stated at a sealed side
bar conference.

On December 21, 2005, the defendant failed to report to
Pretrial Services and an arrest warrant was issued. In July of
2006, the defendant was arrested in Puerto Rico by the United

States Marshals Service pursuant to the default warrant. The defendant made an Initial appearance on August 21, 2006, and a Status Conference was held on August 29, 2006. During the Status Conference counsel for the defendant requested time within which to talk to the defendant in order to determine whether there would be a trial or a change of plea. The Court then scheduled another Status Conference for October 2, 2006.

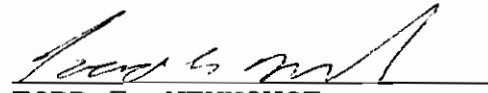
The exclusion of this time from the Speedy Trial time period is in the interests of justice. The defendant assents to this motion.

Therefore, the government moves that the Court exclude the time between December 21, 2005 and August 21, 2006 from the speedy trial time period pursuant to 18 U.S.C. §3161(h)(3)(A). Further, the government moves that the Court exclude the time between August 21, 2006, and October 2, 2006, from the speedy trial time period pursuant to 18 U.S.C. §3161(h)(8)(A).

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

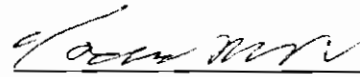

TODD E. NEWHOUSE
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
August 30, 2006

I, Todd E. Newhouse, Assistant U.S. Attorney, do hereby certify that I have served, by first class mail, a copy of the foregoing, to all counsel of record.



TODD E. NEWHOUSE
Assistant U.S. Attorney